

# SUMMONS (CITACION JUDICIAL)

FOR COURT USE ONLY  
(SOLO PARA USO DE LA CORTE)

**NOTICE TO DEFENDANT:  
(AVISO AL DEMANDADO):**

City County of San Francisco, Main Public Library,  
Tramaine Johnson,  
John Doe Stalker

**YOU ARE BEING SUED BY PLAINTIFF:  
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

JULIANNA AGARDI

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:  
(El nombre y dirección de la corte es): SUPERIOR COURT FOR COUNTY OF  
SAN FRANCISCO, 400 McAllister St, San Francisco, CA 94102

CASE NUMBER:  
(Número del Caso):

CGC-24-616950

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:  
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):  
JULIANNA AGARDI, 237 LEAVENWORTH ST #203 415-59-6543

DATE:  
(Fecha)

AUG 02 2024

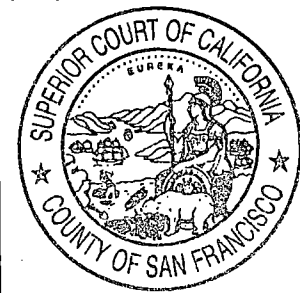
Clerk, by  
(Secretario)

Deputy  
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)  
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

JAMES XIONG

[SEAL]



**NOTICE TO THE PERSON SERVED: You are served**

- ☒ as an individual defendant.
- ☐ as the person sued under the fictitious name of (specify):
- ☐ on behalf of (specify):  
under: ☐ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)  
☐ CCP 416.20 (defunct corporation) ☐ CCP 416.70 (conservatee)  
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)  
☒ other (specify): PRIVATE CAPACITY /OR AN EMPLOYEE OF THE LIBRARY
- ☐ by personal delivery on (date): ELECTRONICAL FILING

1 **JULIANNA AGARDI**  
2 **IN PRO PER**  
3 **237 LEAVENWORTH ST # 203**  
4 **SAN FRANCISCO .CALIFORNIA**  
5 **94102**  
6 **juliannaagardi@aol.com**  
7 **415-579-6543**

**FILED**  
Superior Court of California  
County of San Francisco

**AUG 02 2024**

CLERK OF THE COURT

BY:  Deputy Clerk

**JAMES XIONG**

7 **SUPERIOR COURT FOR CALIFORNIA**  
8 **COUNTY OF SAN FRANCISCO**

9  
10 **JULIANNA AGARDI,**

11 **Plaintiff,**

12 **vs.**

13  
14 **CITY & COUNTY OF SAN**  
15 **FRANCISCO**

16 **MAIN PUBLIC LIBRARY**

17 **TRAMaine JOHNSON**

18 **JOHN DOE STALKER,**

19 **Defendants**  
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CASE NUMBER: **C6C-24-616950**

COMPLAINT UNDER  
GOVERNMENT CODE §§ 810-996.6,  
CALIFORNIA GOVERNMENT CODE  
SECTIONS 810-996.6) ...820.815.2,910  
(REST.2D TORTS, § 652D.)  
ARTICLE I, SECTION 1 OF THE  
CALIFORNIA CONSTITUTION  
INTENTIONAL INTERFERENCE OF  
PRIVACY  
INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS.  
STALKING  
HARASSMENT  
HARASSMENT OF A SEXUAL NATURE.  
RETALIATION  
FRAUD CALIFORNIA CIVIL CODE §3294  
VIOLATIONS OF OBLIGATION  
CCP §410.10 CIVIL CODE§ 142  
CONSTITUTIONSL RIGHTS VIOLSTIONS

1 PLAINTIFF JULIANNA AGARDI IS A PRIVATE PERSON , DEFENDANT  
2 CITY & COUNTY OF SAN FRANCISCO IS A GOVERNMENTAL ENTITY A  
3 MUNICIPALITY AND ITS DEPARTMENT THE MAIN PUBLIC LIBRARY IS  
4 ALSO A DEFENDANT AND , ITS EMPLOYEE TRAMMAINE JOHNSON .  
John Doe defendant is just that JOHN DOE.

## 7 JURISDICTION

8 Jurisdiction is proper under Cal Const.art VI § 10

## 10 VENUE

- 11 1. Venue is proper under CCP § 395 (a ) Brown Superior Court (1984) 37  
12 Cal 3d 477 482-83 CCP§ 394 (a) County of Orange v Superior Court  
13 ( 1 st Dist 1999) 73 Cal App 4 th 1189,1191 CCP § 393 (b) Public  
14 Officer California State Parks Found v Superior Ct ( 4 th Dist 2007) 150  
15 Cal App 4 th 826-844-45Thurber v Thurber (1896) 113 Cal 607 ,610-4  
16 Mahler v Drummer Boy Gold Mining Co ( 3d Dist 1907) 7 Cal App  
19-,193
- 17 2. The action can be brought where the obligation or liability arose CCP§  
18 395.5 United Pac Ins v Superior Ct (3d Dist 1967) 254 Cal App 2d  
19 897,899 The action arises from the fact of Main Public Library and City  
20 & County of San Francisco's rejection of investigating and remedying  
21 Plaintiff Agardi's complaint. It happened here in San Francisco .This  
22 action gave rise to bring the employee of the Main Public Library's Head  
23 of the Security into this action as one of the Defendants. Plaintiff served  
24 the City with the Notice of Claim and it was rejected upon arrival
- 25 3. Liability arises where the injury occurs,Black Diamond Asphalt Inc v  
26 Superior Ct ( 3 d Dist 2003) 109, Call App 4 th 166 , 172, This option  
27 applies to obligations or liabilities created by tort , contract or statute .  
28 Mission Imps, Inc v Superior Ct ( 1982) 31 Cal 3d 921 ,928
4. CCP § 395 .5 Junean Spruce Corp v International Longshoremen 's  
Warehousemen's UN ( 1951) 37 Cal App 760 , 763 . Abelleira 17 Cal 2d  
at 293 Johnson v City of Loma linda (2000) 24 Cal 4 th .61.70

3. Liability arises where the injury occurs, Black Diamond Asphalt Inc v Superior Ct ( 3 d Dist 2003) 109, Call App 4 th 166 , 172, This option applies to obligations or liabilities created by tort , contract or statute . Mission Imps, Inc v Superior Ct ( 1982) 31 Cal 3d 921 ,928
4. CCP § 395 .5 Junean Spruce Corp v International Longshoremen 's Warehousemen's UN ( 1951) 37 Cal App 760 , 763 . Abelleira 17 Cal 2d at 293 Johnson v City of Loma linda (2000) 24 Cal 4 th .61.70

## INTRODUCTION

This action arises from the Main Public Library's breach of obligation to investigate and remedy Plaintiff Agardi's complaint! Plaintiff filed a Notice of Claim with City and County of San Francisco and the claim was rejected on arrival.

## BACKGROUND

PLAINTIFF IS A SAN FRANCISCO resident and member of the library for over twenty years!

She visits every day and borrow books and using the computers , and the office equipment on a daily basis. On her way in and out Plaintiff everyday has to go through an area of the lobby with metal detectors and computer scanning where the security guards are monitoring the activities! The Guards's Office is also located there.

## CLAIM I BREACH OF OBLIGATION ,RETALIATION

1. On March 24 of 2024 Agardi filed a complaint with the Main Public Library , it was forwarded to the Security Department and as Head of the Security Tramaine Johnson answered and promised an investigation and remedy.
2. The subject matter of the complaint was about the invasion and interference of Agardi's privacy! Her surveillance within the library and blocking her

access for conversations ( as long as half an hour at a times) by a security guard!

3. Several addendum was filed and a retaliation claim involving another library employee!
4. On July 23 2024 Agardi filed another addendum and another complaint pertaining to yet another employee a Chinese woman! This time the complaint requested a Cease and Desist ! All of these communications were submitted by computer to Tramaine Johnson and to the Main Public Library in the same time.
5. Within 3 hours after submission of the second complaint by email to the library and to Tramaine Johnson Agardi was suspended for four months from all the public libraries in San Francisco.
6. This time corresponds roughly to the 180 days to complete an investigation, therefore Agardi concludes that the Main Public Library has no intention to remedy her complaints , therefore this Notice of Claim and Intent is grounded in law and proceeding to the next level to asking for redress from the Board of Supervisor of the City & County of San Francisco was proper!

## **CLAIM II**

### **HARASSMENT, INVASION AND INTERFERENCE WITH PRIVACY**

7. From May 2022 and up to present day Tramaine Johnson was contacted by third party(ies) requesting informations about Agardi's activities within the library , every hi / by of hers was subject to scrutiny and if it was progressing to conversations more scrutiny applied.
8. The third party identified himself as federal criminal investigators, lawyers, attorney in fact , or in another form of agency and representative capacity!
9. In this context happened that this security guard Patrick ?! blocked Agardi's entries and struck up conversations at the metal detector gate and it took place several times a week.
10. At this point entered the into the picture Gentleman # 1 a San Francisco Sheriff's Deputy serving at the library! After recognizing a romantic interest Patrick took the actions on level # 2 action, intercepting Agardi and implying an interest and preventing conversations with the deputy ! These conversations were natural occurrences because Agardi was a regular on a

1 daily basis , came and gone in the same time and she has to move through the  
2 lobby .However Agardi never had any interest to make conversations with  
3 Patrick! The guards and the deputies were located and sitting around the metal  
4 detector's gate, some kind of relationship developing was a natural  
occurrence!

5 11.Agardi presumes that the deputy was also contacted and an ever increasing  
6 pressure was applied to stay away from Agardi!

7 12.This pressure peaked and Agardi stayed away from the library about a month  
8 in January 2023 and the deputy had a severe melt down and was very sick  
emotionally and physically for a long time! This person suffered a lot.

9 13.Enter Gentleman # 2 a security guard employee of the library ( patrol  
10 officer).This relationship was even more scrutinized and at the first contact  
11 the guard was reported and disciplined. It was demanded by the Chinese  
12 Woman ( some kind of supervisory capacity) that Gentleman #2 stop  
13 communicating with Agardi. It went to the point that the Chinese woman was  
14 waiting for Agardi to come outside and when Agardi showed up Gentleman  
# 2 came down from the library with another officer and prevented  
interactions.

15 14.It followed by a scene in the lobby and Agardi was told that the Chinese  
16 Woman continued harassing Gentleman # 2 to cut off every contact with  
Agardi.

17 15.Agardi filed the complaint and Gentleman # 2 disappeared , was not working  
18 for a few weeks. Agardi filed a retaliation claim and Gentleman # 2  
reappeared!

19 16.The pressure continued to build and got to the point when Patrick always  
20 followed the Gentleman # 2 around. They marched in lockstep !

21 17. In the lobby when Gentleman # 2 was on duty and sitting outside , Patrick  
22 literally got so close to him as to almost sitting on him , so did the  
Chinese woman!

23 18.It is presumed that the Chinese Woman was instructed to seduce Gentleman  
24 # 2 and have sex with him ,

25 19.The day when Agardi left and on his way out stopped by to say a few friendly  
26 word Patrick only a few inches away and when Agardi left and joined to a  
27 friend in a conversation Gentleman # 3 Patrick followed and interfered .  
28 Agardi returned to Gentleman # 2 and Patrick immediately came back and  
stood a few inches away!

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### CLAIM III

#### STALKING

20. This control is not by accident. It came to Agardi's attention that at some point in the corruption investigations against the City & County of San Francisco on or about 2016 -2018 an account was found that transferred money from the City's account to another account managed by a Power of Attorney . It is presumed that Agardi is the Principal of this Power of Attorney! Agardi had never signed a single document in these transactions and nothing was received! It is presumed that these actions are originating from the Attorney in Fact whom Agardi does not know! Does not know his real name , address or phone number! Has never had any relationship with this individual other than superficial ones , and certainly had no contact with him in the past 15 years!

21. Clearly , the legitimacy of this power of attorney is at issue and the transactions in it ! It appears that this individual is operating a criminal enterprise , and buying properties, moving money and all of these transactions are signed by forging Agardi's name on the documents!

22. Clearly another man moving into the picture is not an option and it will be removed – no matter what!

23. There are rumours circulating that Agardi is pregnant – she is not and never was.

24. It is presumed that all of these guards are in contact with this individual whom Agardi regards as a Stalker- nothing else!

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### CLAIM IV

#### INTERFERENCE , VIOLATION OF PRIVACY BY THIRD PARTIES

25. It is also presumed that the Stalker is sexually deviant and entertains violent sexual phantasies and forcing the guards to perform these phantasies in the lobby pertaining to inciting jealous rages, humiliations , name calling etc..

1 26. Agardi states that these contacts with the guards were established through  
2 and by Tramaine Johnson presumably under threat and financial rewards.

3 27. Agardi intends to sue Tramaine Johnson and the guards involved with the  
4 Chinese woman as well as the Main Public Library! For harassment,  
5 harassment of a sexual nature! Retaliation and Fraud including privacy and  
6 constitutional rights violations.

7 28. Agardi will sue the Stalker under John Doe principles in a tort claim action  
8 for damages, as well as for other claims.

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11 **PRAYER**

12 **PLAINTIFF AGARDI DEMANDS MONEY DAMAGES UP TO TWENTY**  
13 **MILLION DOLLARS / \$ 20,000,000.00. A POSSIBLE INJUNCTION AND**  
14 **OR RESTRAINING ORDER .**

15 **This complaint contains a verification of the complaint attached to it. Notice**  
16 **of acknowledgment of the service of the summons and complaint.**

17  
18 **Also was served an ADR package.**  
19  
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22   
23 **JULIANNA AGARDI**  
24 **PLAINTIFF IN PRO**  
25 **PER.**  
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# VERIFICATION

FORM No. 2

**Verification of Pleading (Code Civ. Proc., § 446)**  
**Declaration under Penalty of Perjury Form (Code Civ. Proc., §§ 446, 2015.5)**

CASE TITLE Juliana Agosh, V CCSF <sup>by Party</sup>

I, Juliana Agosh, declare:  
(Name)

I am the Pro Per Plaintiff in the above-entitled matter.


I have read the foregoing  
(pleading, e.g., complaint) and know the contents thereof.

The same is true of my own knowledge, except as to those matters which are  
therein stated on information and belief, and, as to those matters, I believe it to be true.

Executed on 8/2/2024, 2024, at San Francisco  
County, California.

I declare (or certify) under penalty of perjury that the foregoing is true and correct.

Juliana Agosh  
(Signature of Party)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>JULIANNA AGARDI</b> <b>237 LEAVENWORTH ST # 203 SAN FRANCISCO .CALIFORNIA 94102</b> TELEPHONE NO.: 415-579-6543 FAX NO.: EMAIL ADDRESS: juliannaagardi@aol.com ATTORNEY FOR (Name):		<b>FOR COURT USE ONLY</b>  <div style="font-size: 2em; font-weight: bold; letter-spacing: 0.5em;">FILED</div> Superior Court of California County of San Francisco  <div style="font-size: 1.2em; font-weight: bold;">AUG 02 2024</div> CLERK OF THE COURT BY:  Deputy Clerk <div style="font-size: 1.2em; font-weight: bold;">JAMES XIONG</div>	
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO</b> STREET ADDRESS: 400 McAllister St MAILING ADDRESS: 400 McAllister St CITY AND ZIP CODE: SAN FRANCISCO CALIFORNIA 94102 BRANCH NAME:		CASE NUMBER: <div style="font-size: 1.5em; font-weight: bold;">CGC-24-616950</div>	
CASE NAME: AGARDI V CITY & COUNTY OF SAN FRANCISCO			
<b>CIVIL CASE COVER SHEET</b> <input checked="" type="checkbox"/> <b>Unlimited</b> (Amount demanded exceeds \$35,000) <input type="checkbox"/> <b>Limited</b> (Amount demanded is \$35,000 or less)		<b>Complex Case Designation</b> <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	
JUDGE:		DEPT.:	

*Items 1–6 below must be completed (see instructions on page 2).*

1. Check <b>one</b> box below for the case type that best describes this case:		
<b>Auto Tort</b> <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) <b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b> <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23) <b>Non-PI/PD/WD (Other) Tort</b> <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input checked="" type="checkbox"/> Other non-PI/PD/WD tort (35) <b>Employment</b> <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	<b>Contract</b> <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) <b>Real Property</b> <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) <b>Unlawful Detainer</b> <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) <b>Judicial Review</b> <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	<b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403)</b> <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) <b>Enforcement of Judgment</b> <input type="checkbox"/> Enforcement of judgment (20) <b>Miscellaneous Civil Complaint</b> <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) <b>Miscellaneous Civil Petition</b> <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)

2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- |  |  |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial postjudgment judicial supervision  |
3. Remedies sought (check all that apply): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☐ punitive
4. Number of causes of action (specify):
5. This case ☐ is ☒ is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)
- Date: 8/1/2024

JULIANNA AGARDI  
(TYPE OR PRINT NAME)

Juliana Agardi  
(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

#### NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2